

REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) DARRIN D. RAINES, Case No. 15-02951 Chapter 13  
All Cases: Moving Creditor MTGLQ Investors, LP Date Case Filed 01/29/2015

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe)

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 1/29/15

Chapter 7: ☐ No-Asset Report Filed on  
☐ No-Asset Report not Filed, Date of Creditors Meeting

1. Collateral

- a. ☒ Home  
b. ☐ Car Year, Make and Model \_\_\_\_\_  
c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$ 177,386.96 per Claim 8-2  
Total of all other Liens against Collateral \$ 0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in all cases) \$ 240,993.00 per Debtor's Schedule A

5. Default

- a. ☒ Pre-Petition Default  
Number of months 34 Amount \$ 32,723.64
- b. ☒ Post-Petition Default  
i. ☒ On direct payments to the moving creditor  
Number of months 6 Amount \$ 8730.00 (with \$1162.39 being held in suspense)  
ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

- a. ☐ Lack of Adequate Protection § 362 (d)(1)  
i. ☐ No insurance  
ii. ☐ Taxes unpaid Amount \$  
iii. ☐ Rapidly depreciating asset  
iv. ☐ Other (describe) \_\_\_\_\_
- b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
- c. ☐ Other "Cause" § 362 (d)(1)  
i. ☐ Bad Faith  
ii. ☐ Multiple filings  
iii. ☐ Other (describe)

d. Debtor's Statement of Intention regarding the Collateral

- i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention filed

Date: 04/22/2020

/s/ Timothy R. Yueill  
Submitted By